

# EXHIBIT H

**From:** [Roshan Shah](#)  
**To:** [Ron Berutti](#); [Matthew.Lynch@law.njoag.gov](#)  
**Subject:** RE: FW: Doe v. Delaware Exhibit A  
**Date:** Monday, May 20, 2024 3:56:38 PM  
**Sensitivity:** Confidential

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Fine with me.

**From:** Ron Berutti <[ron@mnblawfirm.com](mailto:ron@mnblawfirm.com)>  
**Sent:** Monday, May 20, 2024 3:56 PM  
**To:** Roshan Shah <[RShah@andersonshahlaw.com](mailto:RShah@andersonshahlaw.com)>; [Matthew.Lynch@law.njoag.gov](mailto:Matthew.Lynch@law.njoag.gov)  
**Subject:** RE: FW: Doe v. Delaware Exhibit A  
**Sensitivity:** Confidential

Let's do a letter to the judge. You are playing "gotcha" and it is inappropriate in my view in light of the Court's Order and your failure to include anything about credentials therein.

Ronald A. Berutti

**Murray-Nolan Berutti LLC**

136 Central Avenue

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908-588-2111

[Ron@MNBlawfirm.com](mailto:Ron@MNBlawfirm.com)

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**New York:**

30 Wall Street

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New York, New York 10005-2205

212-575-8500

*Please reply to New Jersey*

-----Original message-----

From: "Roshan Shah" [[RShah@andersonshahlaw.com](mailto:RShah@andersonshahlaw.com)]

Sent: Monday, May 20 2024 3:50 PM



To: [Matthew.Lynch@law.njoag.gov](mailto:Matthew.Lynch@law.njoag.gov)

Subject: RE: FW: Doe v. Delaware Exhibit A

Ron,

The letter submitted was a medical record, not an expert report. If there are draft medical records, we should receive them.

She signed the certification. She has an independent duty to determine the veracity of what she signs.

**From:** Ron Berutti <[ron@mnblawfirm.com](mailto:ron@mnblawfirm.com)>

**Sent:** Monday, May 20, 2024 3:42 PM

**To:** Roshan Shah <[RShah@andersonshahlaw.com](mailto:RShah@andersonshahlaw.com)>; [Matthew.Lynch@law.njoag.gov](mailto:Matthew.Lynch@law.njoag.gov)

**Subject:** RE: FW: Doe v. Delaware Exhibit A

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Roshan,

I object to the request for a copy of all drafts of the Letter. Once again, all that is potentially discoverable right now are the medical records and, per agreement, licensure information.

Further, with respect to Ms. Pirozolli, I object to the first licensure request given the representation that it was my error not to make the change in licensure designation prior to filing. Obviously, your request for all licensure will reveal what you need—all licensure.

Please make such revisions to the subpoenas.

Thank you.

Ronald A. Berutti

**Murray-Nolan Berutti LLC**

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212-575-8500

*Please reply to New Jersey*

-----Original message-----

From: "Roshan Shah" [[RShah@andersonshahlaw.com](mailto:RShah@andersonshahlaw.com)]

Sent: Monday, May 20 2024 3:35 PM

To: [Matthew.Lynch@law.njoag.gov](mailto:Matthew.Lynch@law.njoag.gov)

Subject: FW: Doe v. Delaware Exhibit A

Here are the revised Exhibit As.

**From:** Vanessa Tlatenchi <[VTlatenchi@andersonshahlaw.com](mailto:VTlatenchi@andersonshahlaw.com)>

**Sent:** Monday, May 20, 2024 3:27 PM

**To:** Roshan Shah <[RShah@andersonshahlaw.com](mailto:RShah@andersonshahlaw.com)>

**Subject:** Doe v. Delaware Exhibit A

**Sensitivity:** Confidential

Please see attached.

**Vanessa Tlatenchi**  
Paralegal

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E. [vtlatenchi@andersonshahlaw.com](mailto:vtlatenchi@andersonshahlaw.com)

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